## UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

SECURITIES INVESTOR PROTECTION CORPORATION,

Trustee-Applicant,

v.

BERNARD L. MADOFF INVESTMENT SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Substantively Consolidated SIPA Liquidation of Bernard L. Madoff Investment Securities LLC and the Estate of Bernard L. Madoff,

Plaintiff,

v.

NATIXIS, NATIXIS CORPORATE & INVESTMENT BANK (f/k/a IXIS CORPORATE & INVESTMENT BANK), NATIXIS FINANCIAL PRODUCTS, INC., BLOOM ASSET HOLDINGS FUND, and TENSYR LIMITED,

Defendants.

Adv. Pro. No. 08-01789 (SMB)

SIPA Liquidation

(Substantively Consolidated)

Adv. Pro. No. 10-05353 (SMB)

## STIPULATION EXTENDING TIME TO RESPOND AND ADJOURNING THE PRE-TRIAL CONFERENCE

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned herein, that the time by which the Trustee may respond to the Motion to Dismiss filed by Defendant Natixis Financial Products LLC (as successor in interest to Natixis Financial Products Inc.) ("Natixis FP") is extended up to and including August 24, 2018. It is further stipulated and

agreed that Natixis FP shall file its reply by November 16, 2018. The pre-trial conference was scheduled for October 31, 2018, but will now be scheduled for December 19, 2018 at 10:00 a.m. The return date for this matter was scheduled for September 26, 2018, but will now be scheduled for November 28, 2018 at 10:00 a.m.

The parties enter into this stipulated extension (the "Stipulation") on the basis of the Court's Order Granting Supplemental Authority to Stipulate to Extensions of Time to Respond and Adjourn Pre-Trial Conferences, filed May 4, 2018 (Adv. Pro. No. 08-1789 (SMB), ECF 17560).

The extension of time granted by the Stipulation is without prejudice to any future extensions of time.

Except as expressly set forth herein, the parties to this Stipulation reserve all rights and defenses the Trustee and Natixis FP may have, and entry into this Stipulation shall not impair or otherwise affect such rights and defenses, including without limitation any defenses based on lack of jurisdiction.

This Stipulation may be signed by the parties in any number of counterparts, each of which when so signed shall be an original, but all of which shall together constitute one and the same instrument. A signed facsimile, photostatic or electronic copy of this Stipulation shall be deemed an original.

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Dated: May 31, 2018

New York, New York

## **BAKER & HOSTETLER LLP**

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